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January 12, 2022

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VIA ECF ONLY

Hon. Judge Gabriel W. Gorenstein
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: *In re: New York City Policing During Summer 2020 Demonstrations*
Index No. 20-cv-8924 (CM) (GWG)

Your Honor:

The Sow Plaintiffs seek to compel production in response to their case-specific document requests (**Exhibit 1**). This is part of a pattern of the City ignoring discovery requests and their production obligations.

The Sow Plaintiffs served a set of documents on November 15, 2021. Under the rules, responses to those requests were due December 15, 2021. Defendants did not serve responses, or otherwise request more time to respond. On December 24, Plaintiffs sent a follow-up email, noting the holidays, but asking (1) who the person assigned to the task was and (2) when a response would be coming. Some two weeks later, on January 5, Defendants responded, "Give me a day to look into this and I'll get back to you." Defendants have not responded further since then. At the moment we do not know who on the defense team is responsible for responding to this request.

Sow Plaintiffs therefore ask that the Court set a date certain for production — and given the prejudice that would come from only discovering Defendants are withholding significant documents on the eve of high-level depositions, find all non-privilege related objections waived. Plaintiffs seek to compel a response immediately.

We thank the Your Honor for your time and attention to this matter.

BELDOCK LEVINE & HOFFMAN LLP

January 12, 2022

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Very truly yours,

A handwritten signature in blue ink, consisting of a stylized 'D' followed by a horizontal line and a small flourish.

David B. Rankin